

1 MCDERMOTT WILL & EMERY LLP
2 WILLIAM G. GAEDE, III (136184)
3 wgaede@mwe.com
4 SHANE G. SMITH (272630)
5 sgsmith@mwe.com
6 275 Middlefield Road, Suite 100
7 Menlo Park, CA 94025
8 Telephone: (650) 815-7400
9 Facsimile: (650) 815-7401

10 *Attorneys for Isis Pharmaceuticals, Inc.*

11 GIBSON, DUNN & CRUTCHER LLP
12 FREDERICK BROWN (65316)
13 fbrown@gibsondunn.com
14 MICHAEL SITZMAN (156667)
15 msitzman@gibsondunn.com
16 TIMOTHY P. BEST (254409)
17 tbest@gibsondunn.com
18 555 Mission Street, Suite 3000
19 San Francisco, CA 94105-2933
20 Telephone: (415) 393-8200
21 Facsimile: (415) 393-8306

22 *Attorneys for Defendants Santaris
23 Pharma A/S Corp. and Santaris Pharma A/S*

24 IN THE UNITED STATES DISTRICT COURT

25 IN AND FOR THE SOUTHERN DISTRICT OF CALIFORNIA

26 SAN DIEGO DIVISION

27 ISIS PHARMACEUTICALS, INC., a
28 Delaware Corporation,

v.
29 Plaintiff and Counter-Defendant,

SANTARIS PHARMA A/S CORP., a
30 Delaware corporation, and SANTARIS
31 PHARMA A/S, a Danish Corporation,

32 Defendants and Counterclaimants.

33 NO. 11-CV-2214-GPC (KSC)

34 **JOINT MOTION TO EXTEND 45-DAY
35 DEADLINE FOR DISCOVERY MOTIONS
36 RELATED TO PLAINTIFF'S FIRST
37 INTERROGATORIES (NOS. 1, 4-7) TO
38 DEFENDANTS**

39 **Honorable Karen S. Crawford**

1 Plaintiff, Isis Pharmaceuticals, Inc., and Defendants, Santaris Pharmaceuticals A/S Corp.
 2 and Santaris Pharma A/S (collectively, “Defendants”), respectfully and jointly move the Court to
 3 extend the forty-five day deadline for discovery motions an additional thirty days with respect to
 4 Isis’s First Set of Interrogatories (Nos. 1, and 4-7)¹, served on Santaris, pursuant to Civ. L.R. 7.2.
 5 The forty-five day deadline is established pursuant to Judge Crawford’s Chamber Rule V.A.
 6 Defendants served initial responses to Isis’s interrogatories on October 16, 2012. The parties
 7 previously moved to jointly extend the deadline on November 28, 2012. Per the Court’s Order
 8 of December 3, 2012, the current deadline for discovery motion related to Defendants’ response
 9 is December 21, 2012.

10 Since Defendants’ initial response, the parties have met and conferred regarding same.
 11 As part of those discussions, Defendants have agreed to supplement their original responses,
 12 have since supplemented some of their responses, and are working with their client on the
 13 remaining responses. The parties have been actively engaged in discovery-related negotiations
 14 and have recently filed joint motions related to same. Rather than unnecessarily file additional
 15 motions, the parties seek an additional 30-day extension so that Defendants may supplement
 16 their response.

17 **MCDERMOTT WILL & EMERY LLP**

18 DATED: December 14, 2012 By: /s/ William G. Gaede, III
 19 William G. Gaede, III

20 Attorneys for *Isis Pharmaceuticals, Inc.*

21 **GIBSON, DUNN & CRUTCHER LLP**

22 DATED: December 14, 2012 By: /s/ Frederick Brown
 23 Frederick Brown

24 Attorneys for *Santaris Pharma A/S Corp.*
 25 and *Santaris Pharma A/S*

26
 27
 28 ¹ Plaintiff has temporarily withdrawn Interrogatory Nos. 2-3 following the Court-ordered,
 temporary partial stay issued on September 19, 2012 (Dkt. No. 54).

SIGNATURE ATTESTATION

Pursuant to General Order 45.X(B), I hereby attest that concurrence has been obtained from Frederick Brown, counsel for Defendants, indicated by a “conformed” signature (/s/) within this e-filed document.

/s/ William G. Gaede, III

William G. Gaede, III